



ZUCKERMAN  
SPAEDER

Aitan D. Goelman  
PARTNER  
Zuckerman Spaeder LLP  
agoelman@zuckerman.com  
202.778.1999

June 17, 2025

By CM/ECF

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, NY 10007

*See ordered  
6.18.25  
[Signature]*

Re: Kashef v. BNP Paribas SA, No. 16-cv-3228 (AKH)(JW)

Dear Judge Hellerstein:

Pursuant to Rule 4.B of the Court's Individual Rules, Plaintiffs' counsel in the above-referenced action respectfully request leave to file on the public docket redacted versions of Plaintiffs' Opposition to Defendants' Motion to Preclude Expert testimony and deposition excerpts of Plaintiffs' expert Dr. Barry Rosenfeld (as referenced in the declaration of Josh T. Mathew in support of Plaintiffs' Opposition) and to file unredacted versions of both under seal.

The redactions applied to Plaintiff's Opposition brief and Dr. Rosenfeld's testimony are consistent with the parties' agreement, ECF No. 500, and the Court's order allowing parties to apply "narrowly tailored redactions...to individuals' names and other personal information," ECF No. 504. The redacted information exclusively relates to Plaintiffs' personal medical information and was previously redacted from Defendants' exhibits filed on the public docket. *See* ECF 719-13 at 184 (evaluation report of Abulgasim Abdalla filed under seal with redactions highlighted); ECF 719-16 at 5 (evaluation report of Entesar Kashef filed under seal with redactions highlighted). Defendants' redaction of this same information, and filing of unredacted versions under seal, was approved by the Court. ECF 724 (order granting Defendants' Letter Motion to Seal).

Respectfully submitted,

/s/ Aitan D. Goelman

Aitan D. Goelman

cc: Counsel of Record